

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA, *ex rel.*
KUSHWINDER SINGH,

Plaintiff,

v.

ALEDADE, INC., *et. al.*,

Defendants.

CASE NO. 2:21-cv-0410-KKE

**STIPULATED MOTION AND
[PROPOSED] ORDER FOR
EXTENSION OF THE TIME FOR
DEFENDANT ALEDADE, INC. TO
RESPOND TO THE COMPLAINT**

**NOTE ON MOTION CALENDAR:
JUNE 5, 2024**

Plaintiff Kushwinder Singh (“Plaintiff”) and Defendant Aledade, Inc. (“Defendant”) (collectively, “the Parties”), by and through their counsel of record, respectfully submit this Stipulation, and respectfully request that the Court enter the proposed order for an extension of time for Defendant to respond to Plaintiff’s Complaint.

1. On January 10, 2024, the Court unsealed the Amended Complaint against Defendant in the above-captioned action. (Dkt. No. 24).

2. On April 8, 2024, Defendant executed a Waiver of the Service of Summons. (Dkt. No. 27).

3. Defendant’s deadline to respond to Plaintiff’s Complaint is June 7, 2024.

4. The Parties are engaged in discussions regarding whether they may streamline and narrow the litigation.

5. An extension would further judicial economy and no party will be prejudiced by an extension.

6. The Parties jointly request a 45-day extension of Defendant's deadline to respond to the Complaint to facilitate these discussions.

7. Accordingly, the Parties stipulate and respectfully request to extend Defendant's deadline to respond to Plaintiff's Complaint to July 22, 2024. A proposed order is subjoined herewith.

DATED this 5th day of June, 2024. I certify that this memorandum contains 173 words, in compliance with the Local Civil Rules.

Respectfully submitted,

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Attorneys for Defendant Aledade, Inc.

ORDER

IT IS SO ORDERED.

DATED this ____ day of _____, 2024.

Judge Kymberly K. Evanson
United States District Judge